

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

HRISOULA STANTZOS,

Debtor

WEST YORK BOROUGH,

Movant

V.

HRISOULA STANTZOS,

Respondent

Chapter 13

Case No. 1-19-bk-01432-HWV

OBJECTION BY WEST YORK BOROUGH
TO CONFIRMATION OF FIRST AMENDED CHAPTER 13 PLAN

COMES NOW, this 18th day of December, 2019, West York Borough, by and through its attorneys, CGA Law Firm P.C., Craig S. Sharnetzka, Esquire, and respectfully represents the following:

PARTIES

1. Movant is West York Borough, 1381 West Poplar Street, York, Pennsylvania 17404 (hereinafter "Movant"). Movant is represented by CGA Law Firm, Craig S. Sharnetzka, Esquire, 135 North George Street, York, Pennsylvania 17401.

2. The Respondent is the within Debtor, Hrisoula Stantzios, an adult individual, whose last known address is 1965 Normandie Drive, York, Pennsylvania 17408 (hereinafter "Debtor"). Debtor is represented by Pugh and Cutaia, PLLC, Dawn M. Cutaia, Esquire, 115 East Philadelphia Street, York, Pennsylvania 17401.

3. Charles J. DeHart, III Esquire (hereinafter "Trustee"), has been duly appointed and qualified to act as the Trustee in the within bankruptcy case and maintains an office at 8125 Adams Drive, Suite A, Hummelstown, Pennsylvania 17036.

BACKGROUND

4. Debtor filed the within case as a voluntary Chapter 13 on April 5, 2019.

5. The Debtor is the owner of a parcel of commercial real estate located at 1738 Filbert Street, West York Borough, York County, Pennsylvania.

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6. At the time of the filing of the within case, the aggregate amount of pre-petition arrears owed to Movant was \$9,416.39, which is evidenced by Proof of Claim #8 filed on June 11, 2019.

OBJECTION

7. Movant objects to the confirmation of the Debtor's Chapter 13 Plan for the following reasons:

a. The Debtor's Plan does not provide for the payment in full of the pre-petition arrears owed to Movant; and

b. Debtor's Plan is underfunded as to the claims to be paid through the Plan.

WHEREFORE, West York Borough requests that this Honorable Court deny confirmation of the Debtor's First Amended Chapter 13 Plan.

Respectfully submitted,

CGA Law Firm P.C.

/s/Craig S. Sharnetzka, Esquire

Craig S. Sharnetzka, Esquire

Supreme Court No. 83863

135 North George Street

York, Pennsylvania 17401

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on December 18, 2019, a true and correct copy of the attached Objection was served upon the following parties in the following manner:

Name	Mode of Service
Charles J. DeHart, III, Chapter 13 Trustee	Via CM/ECF
Dawn M. Cutaia, Esquire	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Date: 12/18/2019

/s/Craig S. Sharnetzka, Esquire

Craig S. Sharnetzka, Esquire